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Attorneys for Rates Technology Inc.

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

VIBER MEDIA, INC.,

Plaintiff,

v.

RATES TECHNOLOGY INC.,

Defendants.

CIVIL ACTION

No. 13-0953 (DLC)

NOTICE OF MOTIONS

TO: ALL COUNSEL

PLEASE TAKE NOTICE that in accordance with Rules 12(f) and 12(b)(6) of the Federal Rules of Civil, defendant Rates Technology Inc. hereby moves before Honorable Denise L. Cote, United States District Judge, United States District Court, Southern District of New York, 500 Pearl Street, New York, New York 10007, for and order (1) striking paragraph 4 of the Complaint and (2) dismissing all claim of invalidity of patents, including those contained in Complaint paragraphs 18 and 24.

PLEASE TAKE FURTHER NOTICE that in support of said motion, Defendants rely upon all pleadings on file and upon the following documents served herewith:

- (a) Memorandum of Law; and
- (b) Declaration of Gerald Weinberger.

Respectfully Submitted,

Dated: March 11, 2013
New York, New York

SPRINGUT LAW PC

By: Milton Springut
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*Counsel for Plaintiff
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CERTIFICATE OF SERVICE VIA ECF SYSTEM

I hereby certify that on the execution date stated below, I electronically filed the foregoing document and any papers in support thereof with the Clerk of the Court for the U.S. District Court, Southern District of New York, using the electronic case filing system of the Court. The electronic case filing system sent a "Notice of Electronic Filing" to all counsel of record.

Executed on March 11, 2013

SPRINGUT LAW P.C.
Counsel for Plaintiff

/S/ Tal S. Benschar
Tal S. Benschar